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Amendment and Response to Final Office Action Mailed April 18, 2005

REMARKS

In the Final Office Action, the Examiner rejected claims 1-25. By this paper, the Applicants add new claims 26-29 and amend claims 1, 2, 4, 5, 10, 12-17, and 21 for clarification of certain features to expedite allowance of the present application. These new claims and amendments do not add any new matter. Upon entry of these amendments, claims 1-29 will be pending in the present application and are believed to be in condition for allowance. In view of the foregoing amendments and the following remarks, the Applicants respectfully request reconsideration and allowance of all pending claims.

Claim Rejections under 35 U.S.C. § 103

In the Final Office Action, the Examiner rejected claims 1-25 under U.S.C. § 103(a) as unpatentable over Tao Zhou, Exploring Netscape's Directory Server 3.0, April 1998, pages 1-11 (hereinafter referred to as Zhou) in view of Microsoft, Active Directory Overview, posted June 30, 1999, pages 1-11 (hereinafter referred to as Microsoft). Applicants respectfully traverse this rejection.

Legal Precedent

The burden of establishing a *prima facie* case of obviousness falls on the Examiner. *Ex parte Wolters and Kuypers*, 214 U.S.P.Q. 735 (P.T.O. Bd. App. 1979). Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention absent some teaching or suggestion supporting the combination. *ACS Hospital Systems, Inc. v. Montefiore Hospital*, 732 F.2d 1572, 1577, 221 U.S.P.Q. 929, 933 (Fed. Cir. 1984). Accordingly, to establish a *prima facie* case, the Examiner must not only show that the combination includes *all* of the claimed elements, but also a convincing line of reason as to why one of ordinary skill in the art would have found the claimed invention to have been obvious in light of the teachings of the references. *Ex parte Clapp*, 227 U.S.P.Q. 972 (Bd. Pat. App. & Inter. 1985).

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Features of Independent Claim 1 Omitted from Cited References

Applicants stress that the Zhou and Microsoft references, whether considered together or separately, fail to disclose each and every feature of independent claim 1 as amended. For example, as amended, independent claim 1 recites, *inter alia*, "providing a *plurality of device control features* for the networked device in the directory server, wherein the plurality of device control features include a first feature for *configuring parameters* of the network device and a second feature for *executing a control task* at the networked device." (Emphasis added).

In contrast, the Zhou reference merely discloses a general-purpose LDAP directory that stores, publishes, and centrally manages user, group, and other network *information* in one directory on a network. *See* Zhou, page 1. The Zhou reference does *not* disclose providing a device control feature, much less a plurality of such features including a first feature for configuring parameters of a networked device and a second feature for executing a control task at the networked device. Indeed, the Examiner apparently admitted this deficiency in the Office Action by stating that "Zhou does not explicitly teach providing and controlling access to the device control feature in the directory server." Office Action mailed on April 18, 2005, page 5.

Further, Applicants respectfully stress that the Microsoft reference fails to remedy the deficiencies of the Zhou reference. Again, the Microsoft reference is generally limited to *information* rather than *control* features. Claim 1 recites features for *configuring* parameters of a networked device and *executing* a control task at the networked device. In contrast, the Microsoft reference merely discloses controlling access to *information* by, for example, providing "a consistent way to name, describe, locate, access, manage, and secure *information* about individual resources." Microsoft, page 1. Indeed, a portion of the Microsoft reference cited by the Examiner is set forth below, in context, to emphasize its deficiencies:

> In addition to making network management easier for administrators, Active Directory also makes it easier for everyone to use the network. For example, users can directly query the directory for

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> network resources such as printers. Since the
> directory can store *attributes about objects,* it can
> *store* the *location* and the *capabilities* of an
> organization's printers and expose these *attributes* as
> search criteria – so the user can search for "printers
> in Building 6 that print color" directly from the
> "Start" menu in Windows. What's more, the
> directory can *refer* the desktop operating system to
> all the configuration *information* it needs to set up a
> new printer – so when users find the printer they
> want, they can use it right away.

Microsoft, page 7 (emphasis added).

As evidenced by the quote set forth above, the Microsoft reference is merely
directed to providing, storing, and accessing *information.* The Applicants also stress
that the "configuration information" in the above passage enables a user to set up a
personal computer to use the printer, but the printer itself is *not* configured by the
information. In sum, the Microsoft reference fails to disclose a device control feature
in a directory server, much less a plurality of device control features including a first
feature for *configuring* parameters and a second feature for *executing* a control task at
the networked device as set forth in claim 1.

Features of Independent Claim 10 Omitted from Cited References

As a preliminary matter, Applicants stress that independent claim 10 was not
specifically addressed by the Examiner. Further, Applicants remind the Examiner of
the requirement to provide clear explanations of all rejections, as set forth in 37 C.F.R.
§ 1.104 and M.P.E.P. § 707.07. In as much as claim 10 was rejected for the same
reasons as claim 1, Applicants assert that it is allowable in view of the arguments set
forth above. However, in the interest of furthering prosecution, Applicants will
address specific deficiencies of the cited references with respect to claim 10 below.

Applicants assert that the Zhou and Microsoft references, whether considered
together or separately, fail to disclose each and every feature of independent claim 10
as amended. For example, as amended, independent claim 10 recites, *inter alia,*

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"providing server *controls* for the managed server in the directory server ... and *transmitting to the managed server a control task generated by the remote client using one of the server controls for execution by the managed server.*" (Emphasis added).

In contrast, the Zhou reference merely discloses a general-purpose LDAP directory that stores, publishes, and centrally manages user, group, and other network *information* in one directory on a network. *See* Zhou, page 1. The Zhou reference does *not* disclose providing server *controls* for a managed server in a directory server. Additionally, the Zhou reference certainly does not disclose *transmitting a control task* generated using the server control for *execution by the managed server.* Indeed, the Examiner apparently admitted this deficiency in the Office Action by stating that "Zhou does not explicitly teach providing and controlling access to the device control feature in the directory server." Office Action mailed on April 18, 2005, page 5.

Further, Applicants respectfully stress that the Microsoft reference fails to remedy the deficiencies of the Zhou reference. Again, the Microsoft reference is generally limited to *information* rather than *controls.* Claim 10 recites transmitting a *control task* for *execution* by the managed server. As discussed above with respect to claim 1, the Microsoft reference merely discloses controlling access to *information* by, for example, providing "a consistent way to name, describe, locate, access, manage, and secure *information* about individual resources." Microsoft, page 1. Accordingly, the Microsoft reference fails to disclose transmitting to a managed server a control task generated by a remote client using one of the server controls for execution by the managed server.

Features of Independent Claim 17 Omitted from Cited References

Applicants assert that the Zhou and Microsoft references, whether considered together or separately, fail to disclose each and every feature of independent claim 17 as amended. For example, as amended, independent claim 17 recites, *inter alia*, "a device management system for the plurality of networked devices, the device

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management system adapted to *configure and control* the plurality of networked devices." (Emphasis added).

In contrast, the Zhou reference merely discloses a general-purpose LDAP directory that stores, publishes, and centrally manages user, group, and other network information in one directory on a network. *See* Zhou, page 1. The Zhou reference does not disclose a management system adapted to configure and control a networked device, much less a managed system adapted to configure and control a plurality of such devices. Indeed, the Examiner apparently admitted this deficiency in the Office Action by stating that "Zhou does not explicitly teach ... a device management system for the plurality of networked devices." Office Action mailed on April 18, 2005, page 15.

Further, Applicants respectfully stress that the Microsoft reference fails to remedy the deficiencies of the Zhou reference. Again, the Microsoft reference is generally limited to *information* rather than *controls*. Claim 17 recites the device management system is adapted to *configure* and *control* the plurality of networked devices. As discussed above with respect to claim 1, the Microsoft reference merely discloses controlling access to *information* by, for example, providing "a consistent way to name, describe, locate, access, manage, and secure *information* about individual resources." Microsoft, page 1. Indeed, the Microsoft reference is merely directed to providing, storing, and accessing *information*. The Microsoft reference does not teach the ability to actually implement control via the directory server. Accordingly, the Microsoft reference fails to remedy the deficiencies of the Zhou reference with respect to amended independent claim 17.

Features of Independent Claim 21 Omitted from Cited References

As a preliminary matter, Applicants assert that independent claim 21 was not specifically addressed by the Examiner. Further, Applicants remind the Examiner of the requirement to provide clear explanations of all rejections, as set forth in 37 C.F.R. § 1.104 and M.P.E.P. § 707.07. In as much as claim 21 was rejected for the same

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reasons as claim 1, Applicants assert that it is allowable in view of the arguments set forth above. However, in the interest of furthering prosecution, Applicants will address specific deficiencies of the cited references with respect to claim 21 below.

Applicants assert that the Zhou and Microsoft references, whether considered together or separately, fail to disclose each and every feature of independent claim 21 as amended. For example, as amended, independent claim 21 recites, *inter alia*, "transmitting data for the task to the remote networked device from the directory server *for implementation* by the remote networked device." (Emphasis added).

In contrast, the Zhou reference merely discloses a general-purpose LDAP directory that stores, publishes, and centrally manages user, group, and other network information in one directory on a network. *See* Zhou, page 1. The Zhou reference does not disclose transmitting data for implementation by a remote networked device. Indeed, the Examiner apparently admitted this deficiency in the Office Action by stating that "Zhou does not explicitly teach providing and controlling access to the device control feature in the directory server." Office Action mailed on April 18, 2005, page 5.

Further, Applicants respectfully stress that the Microsoft reference fails to remedy the deficiencies of the Zhou reference. Independent claim 21 is directed to implementing actual changes to a networked device via a directory server. As discussed above with respect to claim 1, the Microsoft reference merely discloses controlling access to *information* by, for example, providing "a consistent way to name, describe, locate, access, manage, and secure *information* about individual resources." Microsoft, page 1. Indeed, the Microsoft reference fails to disclose transmitting data for the task to the remote networked device from the directory server *for implementation* by the remote networked device.

In view of deficiencies discussed above, the Applicants respectfully request that the Examiner withdraw the rejection of independent claims 1, 10, 17, and 21 and

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their dependent claims. Further, the Applicants respectfully request allowance of independent claims 1, 10, 17, and 21, and their dependent claims.
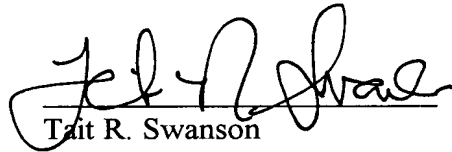
New Claims

As set forth above, the Applicants added new claims 26-29. The Applicants believe these claims are patentable over the cited references and are in condition for allowance based on their respective dependencies and for unique matter recited in each dependent claim. For example, the references of record fail to teach or suggest providing controls in a directory server for a headless server, as recited in claims 26 and 27. In another example, the references of record do not teach or suggest a device management system for a plurality of networked devices, "wherein a one of the plurality of networked devices includes a headless server," as recited in independent claim 29. Therefore, the Applicants request that the Examiner allow the new claims 26-29.

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Conclusion

The Applicants respectfully submit that all pending claims should be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve any other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date:_____July 11, 2005_____

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